

WITHERS BERGMAN, LLP
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*Attorney for: Von Rautenkranz Nachfolger
Special Investments LLC*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES INVESTOR PROTECTION :
CORPORATION, :

Plaintiff, :

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

V. :

BERNARD L. MADOFF INVESTMENT :
SECURITIES LLC, :

Defendant. :

**OBJECTION TO TRUSTEE'S
MOTION TO AFFIRM TRUSTEE'S
DETERMINATIONS DENYING
CLAIMS OF INVESTORS WITHOUT
BLMIS ACCOUNTS IN THEIR
NAMES, NAMELY, INVESTORS IN
FEEDER FUNDS**

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For the reasons set forth in its January 25, 2010 Objection to the Trustee's Determination of Claim (the "January Objection"), incorporated by reference as if fully set forth herein, Von Rautenkranz Nachfolger Special Investments LLC ("Claimant"), by and through its attorneys, hereby objects to the Trustee's Motion to Affirm Trustee's Determinations Denying Claims of Investors without BLMIS Accounts in Their Names, Namely, Investors in Feeder Funds (the "Motion to Affirm") dated June 11, 2010.

Relief Requested


1. For the reasons set forth in the January Objection, Claimant's claim should be allowed in full by this Court to the extent covered under SIPA and the Trustee's Motion to Affirm should be denied.

2. For the reasons set forth in the January Objection, the Court should direct the Security Investors Protection Corporation to issue immediate payment to the Claimant in the amount of \$10,380,675.02, plus interest from the date of the claim.

25. To the extent applicable, Claimant joins in the claims of any other Claimants similarly situated and demands such further relief as this Court shall deem fair and equitable.

DATED: July 8, 2010

WITHERS BERGMAN LLP

By: 
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SECURITIES INVESTOR PROTECTION :	
CORPORATION, :	
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Plaintiff, :	Adv. Pro. No. 08-01789 (BRL)
	:
	SIPA Liquidation
	:
V. :	
	:
BERNARD L. MADOFF INVESTMENT :	CERTIFICATE OF SERVICE BY
SECURITIES LLC, :	ELECTRONIC AND OTHER MEANS
	:
	:
Defendant. :	
-----X	

The undersigned hereby certifies that on July 8, 2010, service of the foregoing Objection to Trustee's Motion to Affirm Trustee's Determinations Denying Claims of Investors without BLMIS Accounts in Their Names, Namely, Investors in Feeder Funds was accomplished pursuant to ECF as to Filing Users. The undersigned also hereby certifies that he shall comply with LR 5.5 as to the parties listed below and service via First Class Mail.

**Clerk of the United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004**

**Irving H. Picard, Trustee
c/o Baker & Hostetler LLP
Attn: Claims Department
45 Rockefeller Plaza
New York, NY 10111**

DATED: July 8, 2010

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